

MAURICE BERNARD STEWART, JR. :
Plaintiff :
BY

DEC 14 2010

AT BALTIMORE
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND

V. : CIVIL ACTION NO.: JFM-10-863
NORMAN A. BROWN, M.D., et al. :
Defendants. :
...ooDoo...

PLAINTIFF'S MOTION FOR COPYWORK
AT THE EXPENSE OF THE GOVERNMENT

Plaintiff, Maurice B. Stewart, Jr., in pro se respect-
fully moves this Honorable Court to grant him copywork
at the expense of the government and states as reasons
the following:

1. The Plaintiff was denied an opportunity to have his
health and disability issues addressed due to the fact that
the requested copywork, which is a video disc showing the
Plaintiff being abused by being dragged on his back by the Leg irons
restraints while suffering from a severely edematous right
arm and unable to ambulate due to cancer and epileptic
seizure disorder, the abuse was done by a correctional officer
and when the Plaintiff attempted to have the video mailed
to the U.S. department of justice (disability Rights Section)
to demonstrate the discrimination and abuse, the prison staff
sent the disc back by mailing it to the Attorney
General's office As to preclude the Plaintiff from
having it mailed out.

2. The denial of the video disc precluded the Plaintiff from Proving to the U.S. department of Justice disability section, a pattern of abuse by D.O.C. Staff toward the Plaintiff.

3. The video disc which was provided by counsel for Co-Defendants Daniel Flannery and David Loasden, was sent to the Court as their exhibit Number 2 in the above-captioned case.

4. The Plaintiff is requesting for the Court to provide him with two copies of the video disc. The Plaintiff need one of the copies sent to: The U.S. Department of Justice, Civil Rights Division, 950 Pennsylvania Avenue, N.W., Disability Rights Section - NYAK, Washington, D.C. 20530 as evidence on Plaintiff's behalf.

And the Plaintiff need the second copy of the Disc mailed to my Sister Located at: 3622 Forest Park Avenue, 2nd Floor, Baltimore, Maryland 21216. Both copies requested are for the purpose of addressing disability discrimination and abuses against me.

5. The Plaintiff is an indigent pro se Litigant and can not afford to pay the cost for the requested CopyWork.

WHEREFORE, Plaintiff prays that this Court grant him his Motion for CopyWork at the expense of the Government and any other relief that this Court deems appropriate.

Respectfully Submitted,
Maurice B. Stewart, Jr.
Plaintiff, pro se

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 10th day of December, 2010, a copy of the Foregoing PLAINTIFF'S Motion For Copywork at the expense of the Government, was mailed, postage prepaid to:

Daniel Flannery and David Logsdon, % Stephanie-Lane-Weber, Esq., Assistant Attorney General and Counsel For above Mentioned Co-Defendants, St. Paul Plaza, 200 St. Paul Place, Baltimore, Maryland 21202.

Nor-Man A. Brown, M.D., % Jon Eric Roades, Esq., Counsel For Defendant Brown, M.D., 204 Monroe Street, Suite 101, Rockville, Maryland 20850.

FILED	ENTERED
LOGGED	RECEIVED

DEC 14 2010

AT BALTIMORE
CLERK, U.S. DISTRICT COURT
-DISTRICT OF MARYLAND

12-10-10

BY

DEPUTY

Dear Miss. Felicia C. Cannon, Clerk:

Please Pass this letter on to the Honorable Judge Motz?

Your Honor, it is necessary for me to have copies of this video disc footage to be sent to the U.S. Dept. of Justice's disability Rights Section because under title II of the Americans With Disability Act / Section 504 of the Rehabilitation Act of 1973. It tell the complainant to forward all proof of discrimination & abuse. I am making an effort to do just that & these prison officials call themselves try to prevent me from showing the justice department by returning the disc back to the state Attorney General's office. The second requested copy of the video i requested be sent to my sister's house because she is attempting to assist me in contacting other resources to address the pattern of abuse. Also as i know you are aware that me as a prisoner can not have possession of a video disc because it is against security of prisons and this is the reason why i requested the 2 disc be sent to the 2 addresses in the Motion & not here to the prison to me?

Thanks,

Respectfully Submitted,
Maurice B. Stewart, Jr.
Plaintiff - pro se